

The Honorable Ricardo S. Martinez  
The Honorable S. Kate Vaughan

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CAROL STEPIEN,

Plaintiff,

v.

NATIONAL OCEANIC AND  
ATMOSPHERIC ADMINISTRATION, an  
Agency of the United States, and  
DEPARTMENT OF COMMERCE,

Defendants.

Case No. C21-1166-RSM-SKV

JOINT STIPULATION TO RENOTE  
CROSS-MOTION BRIEFING  
SCHEDULE

**JOINT STIPULATION TO RE-NOTE CROSS MOTION BRIEFING SCHEDULE**

1. WHEREAS, On or about September 14, 2023, the parties agreed to Re-Note the Briefing Schedule which this court subsequently approved.
2. WHEREAS, On October 3, 2023, Plaintiff in response to Defendant's Cross Motion for Summary Judgment, reached out to Defendant's Counsel on the stipulation of a Third Amended Complaint after review of Defendant's Vaughn Index.
3. WHEREAS, the parties are continuing to negotiate in good faith towards resolution in this case and both feel a short extension of the briefing schedule could potentially resolve the matter or narrow the issues in need of court resolution.

4. WHEREAS, the parties have agreed to re-note the remaining Cross Motion Briefing Schedule for 30 days, to allow for Defendant to evaluate Plaintiff's Proposed Third Amended Complaint, narrow the issues for Summary Judgment, and continue good faith discussions to resolve the case jointly without further briefing.

5. Pursuant to Local Civil Rules 7(k) and 7(l) the parties jointly stipulate to renote and briefly extend the stipulated cross-motion briefing schedule as follows:

	Current Deadline	New Deadline
Plaintiff's Joint Reply in Support of Plaintiff's Motion and Opposition to Defendant's Cross Motion	October 4, 2023	November 3, 2023
Defendants' Reply in Support of Defendants' Cross Motion	October 18, 2023	November 17, 2023

IT IS SO STIPULATED, THROUGH PARTIES OF RECORD.

DATED this October 3, 2023.

TESSA M. GORMAN  
Acting United States Attorney

NOLAN LIM LAW FIRM, P.S.

s/ Katie D. Fairchild  
KATIE D. FAIRCHILD, WSBA # 47712  
Assistant United States Attorney  
United States Attorney's Office  
700 Stewart Street, Suite 5220  
Seattle, Washington 98101-1271  
Phone: 206-553-7970  
Fax: 206-553-4073  
Email: [katie.fairchild@usdoj.gov](mailto:katie.fairchild@usdoj.gov)

s/ Nolan Lim  
NOLAN LIM, WSBA #36830  
1111 Third Avenue, Suite 1850  
Seattle, WA 98101  
Phone: 206-774-8874  
Fax: 206-430-6222  
Email: [nolan@nolanlimlaw.com](mailto:nolan@nolanlimlaw.com)

*Attorney for Plaintiff*

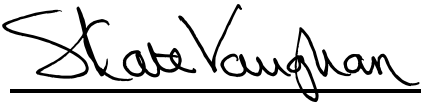
*Attorneys for Defendants*

I certify that this memorandum contains 142 words in compliance with the Local Rules.

**ORDER**

**IT IS SO ORDERED.**

Dated this 3rd day of October, 2023.

A handwritten signature in black ink, reading "S. Kate Vaughan", is written over a horizontal line.

S. KATE VAUGHAN  
United States Magistrate Judge